

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION

RYAN BRESLOW, ALEX FINE, and JON
GORDON,

Plaintiffs,

v.

MARK PHILLIPS and BENJAMIN REED,

Defendants.

Action No.: 23-cv-20727-ALTMAN/Reid

Honorable Roy K. Altman

DECLARATION OF [REDACTED]

I, [REDACTED], make the following declaration based on my personal knowledge:

1. My name is [REDACTED]. I am over the age of 18, competent to testify, and have person knowledge of the matters stated herein.
2. I am a resident of Carrboro, North Carolina.
3. I own the following Ethereum wallet address:
0x823b92d6a4b2AED4b15675c7917c9f922ea8ADAD.
4. I helped write the code for the initial version of the programmable crypto fundraising protocol known as Juicebox (<https://juicebox.money>).
5. Juicebox is a crowdfunding platform that allows projects to fundraise with the cryptocurrency Ethereum. When someone contributes to a project, Juicebox has functionality that allows the project to issue tokens to the contributor. The project can bestow those tokens certain powers to enable the token holder to exercise governance rights, community access, or other contributor perks related to the project. The Juicebox platform allows a project to issue tokens, redeem tokens, manage payouts, and set other rules for contributing to the project. Juicebox also integrates with other tools such as Safe (<https://safe.global>) and Snapshot (<https://snapshot.org>) to help coordinate and manage a project community.
6. The Juicebox platform hosts a project known as PeaceDAO. That project was created on Juicebox on February 19, 2022. The URL for the PeaceDAO project is <https://juicebox.money/p/peacedao>.

7. I participated in a design session with people I believe are affiliated with the Movement DAO project, namely Jon Gordon and Mark Phillips, but I did not expect, or ask for, compensation from said project. I am not owed any money from the Movement DAO project or from anyone affiliated with that project.

8. On or around August 30, 2022, Defendant Phillips told me Movement DAO wanted to send me DAI as gratitude. On October 10, 2022 Phillips messaged me with a transaction hash for the transfer of 10,000 DAI (a stablecoin cryptocurrency), with the comment “for being you.” The transaction was from the following Ethereum address: 0x2187e6a7c765777d50213346F0Fe519fCA706fbD. My understanding is that this Ethereum address is associated with the Movement DAO project.

9. On February 10, 2023, I received another 10,000 DAI to my cryptocurrency wallet from the above-mentioned Ethereum address that I understand is associated with the Movement DAO project.

10. Not understanding what I did to deserve payment, and becoming aware of the ongoing dispute between Plaintiffs and Defendants, I have since returned the 10,000 DAI from February 10, 2022 and the 10,000 DAI from October 31, 2022 to the Movement DAO-affiliated address that sent it to me.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 14th day of April 2023.

